

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

AMERICAN ASSOCIATION OF UNIVERSITY
PROFESSORS, ET AL.,

Plaintiffs,

v.

MARCO RUBIO, ET AL.,

Defendants.

Case No. 1:25-cv-10685 (WGY)

PLAINTIFFS' MOTION TO SEAL

Pursuant to Local Rule 7.2, Plaintiffs respectfully move the Court for leave to file under seal Exhibit 1 (“Exhibit”) to Plaintiffs’ Motion to Compel or for an Adverse Inference filed on July 16, 2025. *See* Dkt. 214. The Exhibit includes 11-pages of documents Defendants provided to Plaintiffs for the first time on July 15, 2025. Given Defendants’ belated production, it is unclear whether the Court is in possession of these documents other than through Plaintiff’s Motion. Out of abundance of caution and pursuant to the Protective Order of this case, Plaintiffs move to file Exhibit 1 under seal to provide the Court a fulsome record.

Plaintiffs have already publicly filed the Exhibit with a slipsheet today. To the extent that portions of the Exhibit are later unsealed, Plaintiffs will unseal the relevant portions of the Exhibit by 6:00 p.m. EST on the next business day. The sealed portions of the Exhibit will not be used or disseminated outside of this litigation, nor outside of their intended purpose.

July 16, 2025

Respectfully submitted,

/s/ Ramya Krishnan
Ramya Krishnan

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Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I, the undersigned counsel, certify that on July 16, 2025, I electronically filed the foregoing motion in the United States District Court for the District of Massachusetts using the CM/ECF system. I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

Dated: July 16, 2025

/s/ Ramya Krishnan

Ramya Krishnan